

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**TROUT POINT LODGE, LIMITED, A Nova Scotia
Limited Company; VAUGHN PERRET and
CHARLES LEARY**

PLAINTIFFS

VERSUS

CIVIL ACTION NO: 1:12CV00090 LG-JMR

DOUG K. HANDSHOE

DEFENDANT

**EMERGENCY MOTION OF PLAINTIFFS TROUT POINT LODGE, LTD.,
A NOVA SCOTIA LIMITED COMPANY; VAUGHN PERRET; AND CHARLES
LEARY FOR STATUS CONFERENCE, EXPEDITED DECISION OF CROSS
MOTIONS FOR SUMMARY JUDGMENT, AND FOR RELATED RELIEF**

COME NOW Plaintiffs, Trout Point Lodge, Ltd., a Nova Scotia Limited Company; Vaughn Perret; and Charles Leary, and file this their Emergency Motion for Status Conference, Expedited Decision of Cross Motions for Summary Judgment and for Related Relief and in support would show that currently pending before the Court are cross motions for summary judgment concerning Plaintiffs' Nova Scotia Judgment against Defendant under the SPEECH Act in the amount of \$425,000.00 plus costs against Defendant for defamation. Defendant has steadfastly and maliciously continued to defame Plaintiffs before, during, and after the parties finished briefing the cross motions for summary judgment, including today's defamatory publication in his internet based "Slabbed", a copy of which is attached hereto as Exhibit "A".

The basis, or part of the basis, for Defendant's statements in Exhibit "A" is Government's Notice of Intent to Introduce Intrinsic Evidence or, Alternatively, Notice of "Other Act" Evidence Pursuant to Rule 404(b) of the Federal Rules of Evidence which was filed in the cases styled *United States of America v. Aaron F. Broussard, Thomas G. Wilkinson* pending in the

United States District Court, Eastern District of Louisiana, Criminal No: 11-299, Section "HH"(SHF), a copy of which is attached hereto as Exhibit "B". When reading Exhibits "A" and "B" together, there is absolutely no way that the defamation published by Defendant can in any way be based upon the contents of Exhibit "B"; and in fact, the opposite is true. The U.S. Attorney's filing set forth in Exhibit "B" proves that Plaintiffs are not involved with the corrupt practices Defendant alleges in today's publication set forth in Exhibit "A". Plaintiffs are nowhere mentioned in that pleading.

Defendant's continuous defamation amounts to wrongful threats, harassment, and attempted intimidation of the plaintiffs as well as veiled threats to witnesses before this court.

In addition to Defendant's defaming Plaintiffs, he also continues to comment upon this Court in this proceeding.

Because the damage to Plaintiffs' reputations continue to grow with every false and defamatory publication uttered by Defendant, including Exhibit "A", the Plaintiffs request the Court to expedite its decision on the cross motions for summary judgment so that, in the event Plaintiffs prevail, they can enforce their Nova Scotia judgment in Mississippi against Defendant and in that way hopefully end Defendant's tireless defamation. Additionally, Plaintiffs request a status conference as soon as convenient with the Court to explain how their damages are growing from the continuous defamatory publications such as those set forth in Exhibit "A" and request the Court to either set a hearing or an expedited briefing schedule on Plaintiffs' request for the Court to enter an order compelling Defendant not to comment upon this proceeding or the facts giving rise to this proceeding until the Court has reached a final decision on the parties' cross motions for summary judgment.

Respectfully submitted, this the 11th day of September, 2012.

Trout Point Lodge, Limited, Vaughn Perret and
Charles Leary

By: s/ Henry Laird
Henry Laird, Mississippi Bar No. 1774

CERTIFICATE OF SERVICE

I, Henry Laird, do hereby certify that I have sent a true and correct copy of the foregoing Emergency Motion by using the ECF system to the following:

G. Gerald Cruthird, Esquire
Post Office Box 1050
Picayune, Mississippi 39466
Email: ggeraldc@bellsouth.net

Jack E. Truitt, Esquire
The Truitt Law Firm, LLC
149 North New Hampshire Street
Covington, LA 70433
Email: mail@truittlaw.com

This the 11th day of September, 2012.

s/ Henry Laird
Henry Laird

Henry Laird (MSB No. 1774)
Email: hlaird@joneswalker.com
Jaklyn Wrigley (MSB No. 103773)
Email: jwrigley@joneswalker.com
Jones, Walker, Waechter, Poitevent,
Carrère & Denègre, LLP
2510 14th Street, Suite 1125 (39501)
Post Office Drawer 160
Gulfport, MS 39502
Telephone: (228) 864-3094
Facsimile: (228) 864-0516